

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

CT102 LLC d/b/a Metro Motors and H.

Jeffrey Baker

Plaintiffs,

v.

Civil Action No.:1:20-cv-356-MSM-PAS

Automotive Finance Corporation d/b/a AFC;
NextGear Capital, Inc.; Manheim, Inc. and
ADESA, Inc.,

Defendants.

**PLAINTIFFS' OPPOSITION TO DEFENDANT NEXTGEAR CAPITAL, INC.'S AND
DEFENDANT MANHEIM REMARKETING, INC.'S MOTIONS TO DISMISS,
ALTERNATIVE MOTION TO STAY, AND MANHEIM'S MOTION TO STRIKE JURY
DEMAND**

Now come Plaintiffs, CT102, LLC d/b/a Metro Motors and H. Jeffrey Baker to oppose both Motions to Dismiss filed separately by Defendant NextGear Capital, Inc. and Defendant Manheim Remarketing, Inc. for the reasons set forth in the accompanying Memorandum of Law. Plaintiffs also oppose Manheim's Alternative Motion to Stay Pending Arbitration and its Motion to Strike Plaintiffs' Jury Demand as set forth in the accompanying Memorandum.

Dated: January 21, 2022

Respectfully submitted,

**CT102 LLC d/b/a Metro Motors and H.
Jeffrey Baker,
Plaintiffs,
By their Attorney,**

/s/ Harris K. Weiner
Harris K. Weiner (#3779)
Harris K. Weiner Law
197 Taunton Avenue
East Providence, RI 02914
Tel.: 401-437-4450
Fax.: 401-438-1630
harris@hkweinerlaw.com

CERTIFICATE OF SERVICE

I, Harris K. Weiner, hereby certify that on January 21, 2022 a copy of the foregoing document, filed through the CM/ECF system, will be sent electronically to all counsel of record.

/s/ Harris K. Weiner